



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

201-15624

JUL 15 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Jerry W. Dunn
Vice President of EHSA
Celanese Chemicals Americas
1601 West LBJ Freeway
PO Box 819005
Dallas, TX 75381-9005

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Dear Mr. Dunn:

Thank you for your letter of November 29, 1999, to the U.S. Environmental Protection Agency (EPA). I apologize for the lengthy delay in responding to your request.

In your letter, you have provided the following: (1) an update on Celanese's commitment to the HPV Challenge Program; (2) clarification for issues associated with three HPV chemicals; and (3) a request for delisting one HPV chemical from the HPV Challenge Program Chemical List. In reference to (2), you announced a start year deferral until 2002 for chemical "1,3-Butylene Glycol (CAS No. 107-88-0); this is acceptable to EPA. EPA also notes it received your original test plan in December, 2002 and your revised test plan in August, 2003. For Methoxymethanol, (CAS No. 4461-52-3) you have indicated that this chemical exists in equilibrium concentrations within certain formaldehyde, methanol, and water mixtures. Additionally, your letter indicates that Methoxymethanol, (CAS No. 4461-52-3), is not stable or isolatable at ambient conditions resulting in difficulties in testing. Also, you mention that the toxicological effects of Methoxymethanol, CAS No. 4461-52-3, would be expected to be those of its components, formaldehyde and methanol which are HPV chemicals volunteered by Celanese as part of a consortia. The intent would be to represent Methoxymethanol (CAS No. 4461-52-3) from toxicological information concerning formaldehyde and methanol.

Your letter also identifies Diamylamine as a mixture of three isomers: N-(2- and 2-Methyl-N-(2-Methylbutyl)-1-Butanamine (CAS No. 61361-18-0); N-Pentyl-1-Pentanamine (CAS No. 2050-92-2); and 2-Methyl-N-(2-Methylbutyl)-1-Butanamine (CAS No. 27094-65-1). Your letter states these isomers are not isolatable, therefore any future HPV testing will be done on the mixture, not any one isomer of the mixture. Finally, your letter indicates that Hydracrylic acid, acrylate (CAS No. 24615-84-7) was reported by Hoechst Celanese or

Celanese in error as part of its Inventory Update Rule (IUR) reporting. You indicate the substance, commonly known as acrylic acid dimer, is always present as an unintentional byproduct/impurity in the production of acrylic acid and is not isolated as an intermediate or product. You identify acrylic acid as a substance that has been fully tested in the OECD HPV SIDS Program. Therefore, your letter requests that Hydracrylic acid, acrylate, (CAS No. 24615-84-7) be delisted from the HPV Challenge Program Chemical List.

In response to your intentions regarding testing of Methoxymethanol (CAS No. 4461-52-3), it is acceptable to submit a test plan for Methoxymethanol presenting the rationale for why the chemical would be difficult to test and your proposal for using data on formaldehyde and methanol to characterize the substance.

Concerning your request to test Diamylamine as a mixture of three isomers: N-(2-Methylbutyl)-1-Pentanamine (CAS No. 61361-18-0); N-Pentyl-1-Pentanamine (CAS No. 2050-92-2); and 2-Methyl-N-(2-Methylbutyl)-1-Butanamine (CAS No. 27094-65-1) it is acceptable to submit a test plan for Diamylamine presenting the rationale for testing the isomer mixture and explaining why the testing will adequately characterize the available commercial product.

Your letter also requests EPA delist Hydracrylic acid, acrylate, (CAS No. 24615-84-7) because it was reported by Hoechst Celanese in error as part of its Inventory Update Rule (IUR) reporting. You indicate that the substance, commonly known as acrylic acid dimer, is always present as an unintentional byproduct/impurity in the production of acrylic acid and is not isolated as an intermediate or product. EPA recommends that you amend your IUR reporting if you believe Hydracrylic acid, acrylate, (CAS No. 24615-84-7), is a byproduct as this term is defined under 40 CFR 710.4(d)(2).

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website (www.epa.gov/chemrtk) in March 1999. Based on our review of the most up-to-date Inventory Update Rule (IUR) reporting for years 1998 and 2002, EPA has determined that Hydracrylic acid, acrylate (CAS No. 24615-84-7) **does not meet** the no longer HPV criteria. EPA will continue to consider the substance to be reportable under the IUR and included on the HPV Challenge Program Chemical List.

We will post your letter, accompanied by this reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the

TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsca-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201